

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EUCLIDES SOTO, LOUIS A. MARTINEZ,
JOSE RAMIREZ, CLEMENTE HERNANDEZ,
CESAR PIZARO, ELISON PENA,
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,
ANGEL BAEZ, ANTONIO MARTINEZ,
WILFREDO ORTIZ, EULOGIO ORTIZ,
MIRRAIN MIRANDA, RAFAEL MORENO,
NELSON ACEVEDO, and
RAMON RODRIQUEZ,

Plaintiffs,

v.

SHERMAN-FEINBERG CORPORATION,
FARNSWORTH FIBRE CORPORATION,
UNITED STEELWORKERS OF AMERICA,
LOCAL 421-U, and UNITED STEELWORKERS
OF AMERICA,

Defendants.

Civil Action No.
04-10892-JLT

**JOINT MOTION FOR A FINAL PRETRIAL
CONFERENCE AND PRETRIAL ORDERS**

Now come the Plaintiffs and the Union Defendants and hereby move that the Court schedule a final pretrial conference and issue final pretrial orders in the above-captioned matter. As grounds for this motion, the parties state that they are under no pretrial orders of any kind regarding the exchange of witness lists or documents.

Pursuant to Local Rule 7.1, the undersigned counsel for the Union Defendants conferred with counsel for the Corporate Defendants, who has assented to this motion.

WHEREFORE, the parties respectfully request that the Court schedule a final pretrial conference and issue any necessary pretrial orders to facilitate and expedite the trial in this matter.

Respectfully submitted,

Dated: November 28, 2005

s/Alfred Gordon
Harold L. Lichten, BBO # 549689
Alfred Gordon, BBO # 630456
Pyle, Rome, Lichten, Ehrenberg
& Liss-Riordan, P.C.
18 Tremont St., Ste. 500
Boston, MA 02108
(617) 367-7200

Theresa Merrill
Assistant General Counsel
United Steelworkers of America
Five Gateway Center
Pittsburgh, PA 15222
(412) 562-2533

s/Robert Berger
Robert Berger, BBO# 038900
11 Beacon Street, Ste. 1210
Boston, MA 02108

s/John Lee Diaz
John Lee Diaz, BBO #542819
Law Offices of John Lee Diaz
801A Tremont Street
Boston MA 02118

CERTIFICATE OF SERVICE

I hereby certify that, in addition to being electronically filed, a true copy of the above document was served by first class mail, postage prepaid on the attorney of record for each party on November 28, 2005.

s/Alfred Gordon
Alfred Gordon